

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On February 1, 2007, Vantage Mobility International [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. _____) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: February 16, 2007

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Vantage Mobility International, LLC

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

David H. Eaton

Telephone Number: 602-304-3265 Fax No.: 602-385-5865

Name and Title of Person who prepared this report.

David H. Eaton
Vice President Technical Services

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): VMI Ford Freestar **Model Years Involved:** 2004-2006

Model(s): VMI Ford Freestar Conversion

Production Dates: Beginning: 1/16/2004 **Ending:** 10/16/2006

VIN Range: Beginning: 2FMZA51616BA24038 **Ending:** FMZA58244BB08547

Vehicle Type: Light **Bodystyle:** Mini Van

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

All recall vehicles include all VMI Ford Freestar models converted before October 16, 2006.

Make(s): VMI Ford Freestar **Model Years Involved:** 2004-2006

Model(s): VMI Summit

Production Dates: Beginning: 1/16/2004 **Ending:** 10/16/2006

VIN Range: Beginning: 2FMZA51616BA24038 **Ending:** FMZA58244BB08547

Vehicle Type: Light **Bodystyle:** Mini Van

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

All recall vehicles include all VMI Ford Freestar models converted before October 16, 2006.

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1,

1996 through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

100% of all VMI Ford Freestar models converted between January 16, 2004 and October 16, 2006.

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Vehicles Model	Year	Number of Potentially Involved
VMI Northstar	2004-2006	447
VMI Summit	2004-2006	299

Total Number Potentially Affected by the Recall: 742

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 5% or less

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

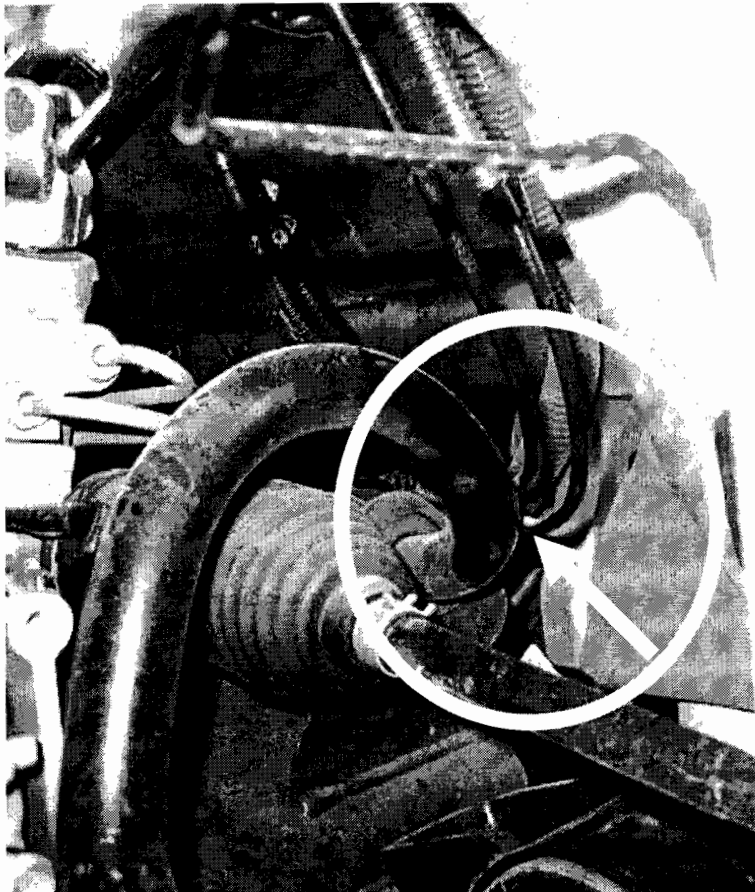
The defect showed up on early 2004 production Freestar conversions. We addressed the problem on the production line at that time based. Another failure showed up on a vehicle produced in October of 2005. Rather than taking for granted that this 2005 vehicle was an anomaly VMI chose to play it safe and recall all Ford Freestar conversion

vehicles build before October 16, 2006. This is the date in which we put a failsafe process in place to prevent the defect on production vehicles.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

VMI installs a new floor on the Ford Freestar minivan chassis that is 10 inches lower than the OE floor (the new lowered floor is about 10" lower than the OE floor just forward of the rear bench seat and about 6" at the driver/passenger area). The purpose of the lowered floor is to allow adequate room for a person in a wheelchair to enter and maneuver inside the vehicle. Because of this VMI must reroute the OE brake lines. On several occasions end users have reported a loss of braking due to the rerouted line rubbing on the Ford sway bar located under the engine and in between the two front tires.
(see photo below)



It is possible that the rerouted brake lines could rub on the front sway bar at the point shown in this photograph.

Describe the cause(s) of the defect or noncompliance condition.

The brake lines were not routed far enough away from the sway bar.

Describe the consequence(s) of the defect or noncompliance condition.

Vehicles could lose some or all of the braking ability should a line fully wear through and drain the brake fluid.

Identify any warning which can (a) precede or (b) occur.

Loss of brake fluid, soft brakes, loss of brakes.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

~~7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.~~

January 16, 2004 – VMI completes first Ford Freestar conversion

December 15, 2004 – the first brake line failure was reported to VMI.

January 25, 2005 – VMI Quality Alert was issued and production personnel were retrained to properly reroute the brake lines

September 21, 2006– Failure reported to VMI on vehicle in Maryland. VMI starts an investigation.

October 16, 2006 – VMI agrees to initiate recall.

October 17, 2006 – VMI reissues Quality Alert and instigates aggressive visual inspection until permanent resolution is implemented.

December 19, 2006 – Permanent solution implemented.

February 9, 2007 – David Eaton contacts Pat Wallace at NHTSA for instruction to register recall with NHTSA.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The

manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

VMI will set a flat rate labor reimbursement for an inspection of the brake line routing. The reimbursement will be \$55 if an inspection is conducted and no wear marks on the brake lines are detected. If it is determined that the brake lines are partially worn, VMI will have the worn line(s) replaced at a Ford dealer. VMI will reimburse the Ford dealer for their work.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

See attached Recall Instructions.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Should an inspection be performed resulting no wear on the existing brake lines, the brake lines do not need to be replaced but a holding bracket must be installed per the Recall Instructions. Should wear be evident, the lines must be replaced with OEM lines by a Ford dealer per the Recall Instructions.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Temporary remedy was put in place October 17, 2006. The permanent remedy was implemented on approximately January 1, 2007. The permanent remedy is identical to the permanent production remedy.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

See attached Recall Timeline

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

I will furnish a copy of all documents as they are generated and before they are delivered.